

**Before the
Federal Communications Commission
Washington, D.D. 20554**

In the matter of

MB Docket No. 03-185

Parts 73 and 74 of the Commission's Rules
to Establish Rules for Digital Low Power
Television, Television Translator, and
Television Booster Stations and to Amend
Rules for Digital Class A Television
Stations

To: The Commission

As owner / operator of LPTV station KHEM-LP, we respectfully submit the following comments in general reply to what has already been submitted.

Digital Incentives

We feel it is in the best interest of our community that the digital transition be completed as soon as possible. If the Commission were to provide certain incentives, we believe LPTV operators would jump at the digital opportunity. We suggest two:

- Any LPTV operator who wishes to convert to digital operations may seek a second channel for analog operations until the end of the digital transition.
- The commission should set a date (early enough in the transition to be meaningful) by which any LPTV station that converts to digital operations will be granted must-carry rights on the cable systems within the station's digital coverage area.

With incentives such as these in place, LPTV operators will aggressively seek to fulfill the Commission's desire to see digital television available in rural America.

IF the Commission does not grant to LPTV operators the opportunity to seek a second channel for analog operations during the digital transition, it is imperative that the Commission NOT require LPTV stations to convert to digital programming until the end

of the transition. Our station serves a retirement community where many people enjoy the free programming we provide. Many of our viewers cannot afford subscriber television and frequently there are Association/Park rules restricting the use of large rooftop antennas needed to receive free broadcasts from Los Angeles. We have heard from our viewers that our station is the only one they can receive. To take away this free service without replacing it would cause many of them undue hardship.

Call Sign Suffixes

Call sign suffixes should be the same for all digital stations, whether low power or full power.

On-Channel Digital Boosters

We support the idea of allowing LPTV stations to apply for on-channel digital boosters to carry their signal further into isolated / terrain shadowed communities they are otherwise unable to reach.

We respectfully submit these comments,

Victor W. Page

Licensee, KHEM-LP

Kevin L. Page

General Manager, KHEM-LP